

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division**

Anita B. Brown,

Debtor.

Case No. 19-10921-PMM
Chapter 13

Motion for Order to Show Cause

Debtor Anita B. Brown, through her attorney, moves this Court as follows:

1. On December 8, 2023, the Court entered order directing Wells Fargo Bank, N.A. to produce documents on or before December 22, 2023. ECF No. 118.
2. Wells Fargo has failed to comply with the order. Exhibit A.
3. The Court must hold Wells Fargo in contempt for its failure to comply with an injunctive order.
4. The Court must sanction Wells Fargo by disallowing Claim No. 5 in its entirety as allowed by Fed. R. Civ. P. 37(b)(2)(A)(iii), and by awarding attorney fees and costs to the Debtor.

For those reasons, the Court must enter relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: June 3, 2024

CIBIK LAW, P.C.
Attorney for Debtor

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